



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



485464

June 26, 2007

REPLY TO THE ATTENTION OF:

Certified Mail

Return Receipt Requested

SR-6J

Mr. Robert W. Wilhelm II
Vice President/Senior Hydrogeologist
Haley & Aldrich, Inc.
44808 Helm Street
Plymouth, Michigan 48170

RE: U.S. EPA Conditional Approval of April 2007 Work Plan for the Evaluation of Soil Vapor Intrusion - North Bronson Former Facilities Site - Former Scott Fetzer Facility OU (B5Y1-03) - Docket No. V-W-02-C-700

Dear Mr. Wilhelm:

The U.S. Environmental Protection Agency (U.S. EPA) and the Michigan Department of Environmental Quality (MDEQ) have reviewed the April 2007 Work Plan for the Evaluation of Soil Vapor Intrusion. U.S. EPA hereby approves the Work Plan with the following conditions:

1. General - U.S. EPA, MDEQ, and the Scott Fetzer Company will evaluate the data collected and determine the need for additional soil gas sampling locations and in-home sampling locations. Structures should be directly sampled when there is a risk of exceeding Acceptable Indoor Air Concentrations (AIACs) and/or U.S. EPA risk-based criteria. Indoor air and sub-slab sampling should also be conducted even if Acceptable Soil Gas Screening Concentrations (ASGSCs) are exceeded and mitigation is warranted under Michigan Part 201.
2. General - The work plan does not discuss the preferred conditions for indoor air sampling. These conditions include building closure for 12 to 24 hours and avoidance of appliance usage such as exhaust fans, clothes dryers, and operating fireplaces, prior to sampling. Appendix E of the EPA publication EPA530-D-02-004 titled "OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance), dated November 2002, provides additional discussion. Cooperation of the building inhabitants is necessary to meet the desired conditions to the maximum extent possible. Please discuss these issues with the inhabitants prior to sampling.
3. General - Experience at other sites and from other states has indicated that the time of year can significantly influence vapor intrusion. Therefore, it will be necessary to note the weather and temperature conditions during the test. These conditions include temperature (indoor and outdoor), wind direction, wind speed, and precipitation. Additional guidance can be found in the OSWER Draft Guidance and some of the documents referenced within the OSWER draft guidance.
4. **Section 1, Introduction, Page 1, 3rd and 4th paragraphs.** The addresses of several private residences are provided within the text, but are not included on Figures 1 or 2. Similarly, Figures 1 and 2 identify several private residences by a non-address number, but the number is not included within the text. There is no way to correlate the addresses in the text with positions in the figures. Please provide U.S. EPA and MDEQ with updated Figures 1 and 2.

5. **Section 1, Introduction, Page 2, 2nd paragraph, first bullet.** There is a more recent version of the Michigan Department of Environmental Quality (MDEQ) Remediation and Redevelopment Division (RRD) Operational Memorandum No.1, Table 1, available. The more recent version is dated January 23, 2006. Comment for information only. No text change required.
6. **Section 2.1, Page 4, 3rd and 5th complete bullets** - U.S. EPA retains the right to require the Scott Fetzer Company to perform indoor air and sub-slab sampling at a structure if data from samples taken immediately adjacent to a structure are below screening criteria but inconsistent with other site data. U.S. EPA's data evaluation will consider area-wide results and how close concentrations are to screening and action limits.
7. **Section 2.1, Page 4, 3rd bullet** - The text indicates that indoor air and sub-slab sampling will only be performed if the resident does not agree to the installation of the mitigation system. If a screening threshold is exceeded and it is clear that mitigation is warranted, in-home and sub-slab air samples should be collected while the mitigation plan is being prepared. U.S. EPA's removal decisions are based on indoor air criteria, and the collection of indoor air data allows U.S. EPA to fully respond to resident and worker inquiries about exposure levels.
8. **Section 2.7, Groundwater Monitoring Well Installations, page 9** - No information is provided concerning proposed monitoring well construction details, such as diameters, construction materials, completion, and proposed drilling techniques. Please provide U.S. EPA with this information prior to scheduling field work or provide U.S. EPA with a reference to an existing work plan.

Please provide the requested follow-up information and contact me to discuss the schedule for field work and access. If you have any questions or wish to schedule a meeting or conference call, please don't hesitate to contact me at 312-353-6564.

Sincerely,



Terese A. Van Donsel
Remedial Project Manager

cc: S. Jaffess, EPA-SFD
L. Johnson, EPA-ORC
D. Larsen, MDEQ
C. Graff, MDEQ
S. Giblin, Jones Day
P. Scanlon, Scott Fetzer
J. Knoepfle, Sullivan International
Site File